

ORIGINAL

FILED IN OPEN COURT  
U.S.D.C. - Atlanta

AUG 03 2021

KEVIN P. WEIMER, Clerk  
By: *[Signature]* Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

UNITED STATES OF AMERICA

v.

STEFAN EBERHARD ZAPPEY

Criminal Indictment

No. 8:21CR- 14

THE GRAND JURY CHARGES THAT:

**General Allegations**

At all times relevant to this Indictment:

1. The conduct alleged in this Indictment occurred in and about Stuttgart, Germany, outside of the jurisdiction of any particular State and District, and within the venue of the United States District Court for the Northern District of Georgia, pursuant to Title 18, United States Code, Section 3238.
2. The defendant, STEFAN EBERHARD ZAPPEY, was then employed by the Armed Forces, as that term is defined under Title 18, United States Code, Section 3267, as an elementary school teacher at a military installation outside of the United States.

**Count One**

*Aggravated Sexual Abuse of a Child Committed by a Person Employed by the Armed Forces Outside of the United States*  
18 U.S.C. §§ 3261 and 2241(c)

Between on or about January 1, 2006, and continuing through on or about December 31, 2007, the defendant, STEFAN EBERHARD ZAPPEY, a citizen of

the United States who was arrested on or about July 23, 2021, in the Northern District of Georgia, while then employed by the Armed Forces outside of the United States, as that term is defined under Title 18, United States Code, Section, 3267, engaged in conduct outside of the United States that would constitute an offense punishable by imprisonment for more than one year if the conduct had been engaged in within the special maritime and territorial jurisdiction of the United States, that is, the defendant, STEFAN EBERHARD ZAPPEY, did knowingly engage in, and knowingly attempt to engage in, a sexual act, as defined under Title 18, United States Code, Section 2246(2), with a child, Minor Victim 1, whose identity is known to the Grand Jury, and who had not attained the age of 12 years.

All in violation of Title 18, United States Code, Sections 3261 and 2241(c).

#### **Count Two**

*Aggravated Sexual Abuse of a Child Committed by a Person Employed by the Armed Forces Outside of the United States*  
18 U.S.C. §§ 3261 and 2241(c)

Between on or about January 1, 2008, and continuing through on or about December 31, 2009, the defendant, STEFAN EBERHARD ZAPPEY, a citizen of the United States who was arrested on or about July 23, 2021, in the Northern District of Georgia, while then employed by the Armed Forces outside of the United States, as that term is defined under Title 18, United States Code, Section 3267, engaged in conduct outside of the United States that would constitute an offense punishable by imprisonment for more than one year if the conduct had been engaged in within the special maritime and territorial jurisdiction of the

United States, that is, the defendant, STEFAN EBERHARD ZAPPEY, did knowingly engage in, and knowingly attempt to engage in, a sexual act, as defined under Title 18, United States Code, Section 2246(2), with a child, Minor Victim 2, whose identity is known to the Grand Jury, and who had not attained the age of 12 years.

All in violation of Title 18, United States Code, Sections 3261 and 2241(c).


A True BILL

Dellrow T. Brunson  
FOREPERSON

KURT R. ERSKINE  
*Acting United States Attorney*

*Leanne M. Marek*

LEANNE M. MAREK  
*Assistant United States Attorney*  
Georgia Bar No. 270935

  
EDUARDO PALOMO  
*Trial Attorney*  
Texas Bar No. 24074847

600 U.S. Courthouse  
75 Ted Turner Drive SW  
Atlanta, GA 30303  
404-581-6000; Fax: 404-581-6181